

# Monsanto

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RCRA PERMITTING & COMPLIANCE BRANCH  
(R/CB)

**The Chemical Group**  
1700 South Second Street  
P.O. Box 7040  
St. Louis, Missouri 63177-7040  
Phone: (314) 622-1400  
**June 2, 1997**

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. Ed Buckner, Chief  
RCRA Branch  
U. S. Environmental Protection Agency  
Region VII  
726 Minnesota Avenue  
Kansas City, Kansas 66101

Dear Mr. Buckner:

In response to the Hazardous Waste Management inspection conducted on May 20, 1997 by Ms. Dedriel Newsome, the following is a description of the corrective actions taken and/or a schedule for completion of the necessary corrective actions to be taken to address the system deficiencies noted by the inspector.

1. Separate incompatibles in <90 storage area. (10 CSR 25-5.262 (1) inc.; 40 CFR 262.34 (a)(1) ref.; 40 CFR 265.177 (c))

At the time of the inspection, there were no incompatibles in storage. However, to eliminate the potential of storage of incompatibles, Monsanto -- Queeny proposes to purchase an additional quantity of spill control/containment pallets, or equivalent, for the storage of one of the potentially incompatible materials. There are currently three (3) spill control/containment pallets on hand and an additional quantity will be purchased for use, as necessary.

The schedule is as follows:

- Put existing pallets in use as necessary -- immediately
- Purchase additional pallets -- 5/27/97
- Receive additional pallets -- 6/30/97
- Put additional pallets in use (as necessary) -- 7/1/97



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2. Containment system cracked (10 CSR 25-5.262. (2) (c) 2 B (iii) (a))

The cracks observed during the inspection are not structural cracks, but are surface stress cracks on the horizontal working surface of the temporary container storage area. These areas will be repaired according to the following schedule. The times indicated are dependent upon satisfactory weather conditions which will allow for the repair work to progress.

- Remove all waste materials from the temporary storage area -- 6/2/97
- Clean the concrete working surface of the temporary container storage area -- 6/3/97
- Grind out the cracks in a V-notch and grout back to the surface with an acid resistant grout material -- 6/4/97
- Re-stripe the lines indicating aisle space -- 6/9/97
- Reseal the complete working surface with a chemical resistant sealer -- 6/10/97
- Return the temporary storage area to service -- 6/15/97

If there are any questions or the need for additional information, please contact Mr. Robert L. Cheever, JFQ and Solid Waste Superintendent at {314} 622-1641.

Sincerely,



James F. Hart,  
Plant Manager

cc F. M. Struckhoff--MDNR